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BEIJING BRUSSELS DUBAI JOHANNESBURG LONDON LOS ANGELES NEW YORK SAN FRANCISCO SEOUL SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 T +1 202 662 6000

VIA ECF

May 15, 2018

The Honorable Katherine B. Forrest **United States District Court** Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.,

Case No. 1:16-cv-08778-KBF [rel. 1:12-cv-03040-KBF]

Dear Judge Forrest:

We write on behalf of Northrop Grumman to respectfully request that the Court grant Northrop Grumman leave to file a 5-page reply in support of its sealed motion to stay on or before Friday, May 18 at noon.

Northrop Grumman believes a short reply is merited for several reasons. First, the Insurers' sealed opposition raises important issues that warrant response. Moreover, Northrop Grumman respectfully submits that the Court would benefit from a more complete and accurate record. Second, the parties had agreed to, and the Court had approved, a briefing schedule that included a reply. The briefing schedule was discussed during a telephonic status conference with Court on April 20, 2018, portions of which the Court sealed pursuant to Northrop Grumman's motion to seal which expressly referenced the reply brief. See ECF No. 102 at 1.

Respectfully submitted,

So Ordered. 5/16/2018

Georgia Kazakis Daniel L. Russell Jr.

cc: All Counsel of Record via ECF

DC: 6722919-1